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VIA FEDERAL EXPRESS

September 2, 2008

The Hon. Miriam G. Cedarbaum  
United States District Court Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Re: Tahani Adonis v. Melissa Coleman et al.,  
Civil Action No. 08-CV-01726

Dear Judge Cedarbaum:

This office represents defendants, Melissa Coleman and Christopher Ferrari, in the above-referenced matter. We submit this letter pursuant to your Individual Rule 1A to request that the time to complete discovery be enlarged. Pursuant to this court's case management plan order of July 23, 2008, all discovery is to be completed by September 30, 2008. Our office recently received a supplemental request for documents. This office would require time to investigate what documents would be responsive to such requests and time to copy and deliver to plaintiff's counsel. Additionally, this office has not yet received documents that were subpoenaed in anticipation of plaintiff's deposition. Further, this office needs additional time to determine once the medical records are received whether to take oral discovery of expert witnesses. Based on the foregoing, the defendants respectfully request that the time for discovery be extended for an additional 60 (sixty) days until December 1, 2008, to complete both written and oral discovery. I have spoken to counsel for plaintiff and she advises that she consents to this request.

Respectfully Submitted,

Roberta L. Martin (RM-7044)  
Assistant Attorney General

c: Robin C. Smith, Esq. via Federal Express Mail